

Message

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**From:** Messina, Edward [Messina.Edward@epa.gov]  
**Sent:** 3/5/2021 9:50:50 PM  
**To:** Pesticidepackaging [Pesticidepackaging@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]; Nesci, Kimberly [Nesci.Kimberly@epa.gov]; Freedhoff, Michal [Freedhoff.Michal@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]  
**Subject:** RE: Florida PFAS Concerns

Thank you Pesticidepackaging e-mail box.....

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Ed Messina, Esq.  
Acting Office Director  
Office of Pesticide Programs  
Office of Chemical Safety & Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
p: (703) 347-0209

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**From:** Pesticidepackaging <Pesticidepackaging@epa.gov>  
**Sent:** Friday, March 5, 2021 2:17 PM  
**To:** Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Freedhoff, Michal <Freedhoff.Michal@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Subject:** FW: Florida PFAS Concerns

FYI: Florida is happy with the additional info we provided today. See below

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**From:** Moffet, Erin <Erin.Moffet@fdacs.gov>  
**Sent:** Friday, March 5, 2021 2:09 PM  
**To:** Kelly Friend <Kelly.Friend@freshfromflorida.com>; Pesticidepackaging <Pesticidepackaging@epa.gov>; Dominy, Randy <Dominy.Randy@epa.gov>  
**Cc:** Frazier, Courtney <courtney.frazier@fdacs.gov>; Jones, Aaryn <Jones.Aaryn@epa.gov>; Brown, Amy <Amy.Brown@fdacs.gov>; Clark, Marah <Marah.Clark@fdacs.gov>; Everton, Jerry <Gerald.Everton@fdacs.gov>; Garcia, Beth <garcia.beth@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Sturdivant, Donnette <Sturdivant.Donnette@epa.gov>  
**Subject:** RE: Florida PFAS Concerns

Yes, thank you all so much for this information and today's call. Looking forward to continuing to share information with folks on the ground as it comes down and flag for you all questions/issues they may be seeing as well.

Best,  
Erin

**Erin M. Moffet**  
Federal Affairs Director | FDACS  
O: (202) 443-4102 | C: (850) 766-7358  
Pronouns: she/her/hers

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---

**From:** Friend, Kelly <[Kelly.Friend@fdacs.gov](mailto:Kelly.Friend@fdacs.gov)>  
**Sent:** Friday, March 5, 2021 2:02 PM  
**To:** Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>; Moffet, Erin <[Erin.Moffet@fdacs.gov](mailto:Erin.Moffet@fdacs.gov)>; Dominy, Randy <[Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)>  
**Cc:** Frazier, Courtney <[Courtney.Frazier@fdacs.gov](mailto:Courtney.Frazier@fdacs.gov)>; Jones, Aaryn <[Jones.Aaryn@epa.gov](mailto:Jones.Aaryn@epa.gov)>; Brown, Amy <[Amy.Brown@fdacs.gov](mailto:Amy.Brown@fdacs.gov)>; Clark, Marah <[Marah.Clark@fdacs.gov](mailto:Marah.Clark@fdacs.gov)>; Everton, Jerry <[Gerald.Everton@fdacs.gov](mailto:Gerald.Everton@fdacs.gov)>; Garcia, Beth <[garcia.beth@epa.gov](mailto:garcia.beth@epa.gov)>; Torres, Ramon <[Torres.Ramon@epa.gov](mailto:Torres.Ramon@epa.gov)>; Zapata, Cesar <[Zapata.Cesar@epa.gov](mailto:Zapata.Cesar@epa.gov)>; Rodgers-Smith, Delores <[Rodgers-Smith.Delores@epa.gov](mailto:Rodgers-Smith.Delores@epa.gov)>; Sturdivant, Donnette <[Sturdivant.Donnette@epa.gov](mailto:Sturdivant.Donnette@epa.gov)>  
**Subject:** RE: Florida PFAS Concerns

Thank you for continuing to provide information that we can provide our stakeholders.

**Kelly Friend**  
Director  
Division of Agricultural Environmental Services  
Florida Department of Agriculture and Consumer Services

(850) 617-7900  
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---

**From:** Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>  
**Sent:** Friday, March 5, 2021 1:59 PM  
**To:** Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>; Friend, Kelly <[Kelly.Friend@fdacs.gov](mailto:Kelly.Friend@fdacs.gov)>; Moffet, Erin <[Erin.Moffet@fdacs.gov](mailto:Erin.Moffet@fdacs.gov)>; Dominy, Randy <[Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)>; Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>  
**Cc:** Frazier, Courtney <[Courtney.Frazier@fdacs.gov](mailto:Courtney.Frazier@fdacs.gov)>; Jones, Aaryn <[Jones.Aaryn@epa.gov](mailto:Jones.Aaryn@epa.gov)>; Brown, Amy <[Amy.Brown@fdacs.gov](mailto:Amy.Brown@fdacs.gov)>; Clark, Marah <[Marah.Clark@fdacs.gov](mailto:Marah.Clark@fdacs.gov)>; Everton, Jerry <[Gerald.Everton@fdacs.gov](mailto:Gerald.Everton@fdacs.gov)>; Garcia, Beth <[garcia.beth@epa.gov](mailto:garcia.beth@epa.gov)>; Torres, Ramon <[Torres.Ramon@epa.gov](mailto:Torres.Ramon@epa.gov)>; Zapata, Cesar <[Zapata.Cesar@epa.gov](mailto:Zapata.Cesar@epa.gov)>; Rodgers-Smith, Delores <[Rodgers-Smith.Delores@epa.gov](mailto:Rodgers-Smith.Delores@epa.gov)>; Sturdivant, Donnette <[Sturdivant.Donnette@epa.gov](mailto:Sturdivant.Donnette@epa.gov)>  
**Subject:** [External] RE: Florida PFAS Concerns

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All,

Please see today's announcement on this subject: <https://www.epa.gov/newsreleases/epa-releases-testing-data-showing-pfas-contamination-fluorinated-containers>

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**From:** Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>  
**Sent:** Friday, March 5, 2021 11:28 AM

**To:** Kelly Friend <Kelly.Friend@freshfromflorida.com>; Moffet, Erin <Erin.Moffet@fdacs.gov>; Dominy, Randy <Dominy.Randy@epa.gov>; Pesticidepackaging <Pesticidepackaging@epa.gov>  
**Cc:** Frazier, Courtney <courtney.frazier@fdacs.gov>; Jones, Aaryn <Jones.Aaryn@epa.gov>; Brown, Amy <Amy.Brown@fdacs.gov>; Clark, Marah <Marah.Clark@fdacs.gov>; Everton, Jerry <Gerald.Everton@fdacs.gov>; Garcia, Beth <garcia.beth@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Sturdivant, Donnette <Sturdivant.Donnette@epa.gov>  
**Subject:** RE: Florida PFAS Concerns

Good morning! I apologize for the delay. Here are some additional answers for you. Please don't hesitate to reach out should you have additional questions.

- *What should be done with remaining stocks of Anvil 10+10? Can more information be provided on the registrant's response? When can they expect the registrant to reach out? Will the product be picked up or returned to the company? Will the product be replaced?*

To minimize risks to human health and the environment, EPA asked states with existing stock of the mosquito product distributed in HDPE containers to discontinue use and hold until its final disposition is determined. The pesticide manufacturer has also notified all its customers regarding management of the product, voluntarily stopped shipments of all products in fluorinated HDPE containers, and is now using non-fluorinated containers.

- *Other than Anvil 10+10, what other packaging/products are affected, including those that may go beyond agrichemical industry such as in the food industry or homeowner products? Can a list be provided?*

EPA is continuing to work to understand the extent and significance of the potential for PFAS contamination and continues to be in close communication with the Food and Drug Administration and the United States Department of Agriculture.

- *Is there a Safety Data Sheet (SDS) for the packaging?*

Safety Data Sheets (SDS) are required by the Hazard Communication Standard (29 CFR 1910.1200(g), which is implemented by the Department of Labor's Occupational Safety and Health Administration (OSHA). The requirement is intended for hazardous chemicals, which are materials/products used by other people/companies. Packaging is not an intended target of the Hazard Communication Standard, but questions related to SDS requirements should be directed to OSHA.

- *Is the PFAS contamination confirmed to be linked to the fluorination process? If so, what are the alternatives to fluorination or alternative types of rigid containers available to the agrichemical industry?*

EPA will be providing additional information that answers this question. We will loop back with this group when this additional information goes public.

- *After Anvil 10+10 is properly mixed (diluting the concentrate) and applied at the maximum label rate, what level of PFAS is making it into the environment?*

The PFAS detections in rinsate from the tested containers does not represent PFAS concentrations in the environment or human exposure to PFAS. EPA is still working to investigate and assess the risk concerns associated with PFAS making it into the environment as a result of fluorinated HDPE containers.

- *Will there be a foreseeable interruption in supply and inventory if the science leads to a change in fluorinated HDPE containers?*

EPA is early in its investigation of the various fluorination processes and the potential for them to produce PFAS. The agency will explore the available alternatives to fluorinated HDPE containers if testing determines that fluorinated HDPE containers cannot be used going forward.

- ***What is the position of other governments and trade partners, including Canada, Mexico, and the European Union, on PFAS? Are levels of concern or action levels established in other countries?***

Like the United States, most of the world's major economies are looking at how to address PFAS in their own regulatory schemes. For example, in the European Union, PFOS and PFOA are banned under the [European Union POPs Regulation](#) and certain PFAS have been proposed for restriction. Canada has also implemented a combination of regulatory and voluntary actions to reduce the risk of certain long-chain PFAS, including [prohibitions](#) on PFOA, long-chain PFCAs, and PFOS. The [OECD PFAS Portal](#) lists other actions countries are taking to address PFAS.

In addition to actions taken at the national level, PFAS are a frequent topic of conversation at the international level, and the United States has long participated in such discussions. For example, in 2009, the United States proposed that the Strategic Approach to International Chemicals Management, known as SAICM, address perfluorinated chemicals by encouraging stewardship programs and relevant regulatory actions. Global actions are also being taken and implemented for some PFAS, such as PFOS, PFOA, and PFOA-related compounds, which have been listed under the Stockholm Convention on Persistent Organic Pollutants for restriction (PFOS) or elimination (PFOA). PFOS is already listed under the Rotterdam Convention, which promotes cooperative efforts among Parties in the international trade of certain hazardous chemicals, and PFOA and PFOA-related compounds are also currently being considered for listing by its Parties.

- ***What will this mean for export/import of agrichemical products? What will this mean for import/export of agricultural crops that were treated with agrichemicals stored in fluorinated HDPE packaging?***

EPA is early in its investigation and assessment of the presence, scope, and impact of fluorinated HDPE packaging on human health, the environment, and trade with respect to potentially affected products as well as relevant import or export markets, should there be any. The agency is actively working with the Food and Drug Administration and the U.S. Department of Agriculture in our assessment. We are also engaging with pesticide companies and entities that make fluorinated containers to raise awareness of this emerging issue.

- ***Will affected products be placed under Stop Sale/Stop Use by EPA or State Lead Agencies?***

EPA has no comment at this time.

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**From:** Friend, Kelly <[Kelly.Friend@fdacs.gov](mailto:Kelly.Friend@fdacs.gov)>

**Sent:** Tuesday, February 23, 2021 2:59 PM

**To:** Moffet, Erin <[Erin.Moffet@fdacs.gov](mailto:Erin.Moffet@fdacs.gov)>; Dominy, Randy <[Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)>; Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>

**Cc:** Frazier, Courtney <[courtney.frazier@fdacs.gov](mailto:courtney.frazier@fdacs.gov)>; Jones, Aaryn <[Jones.Aaryn@epa.gov](mailto:Jones.Aaryn@epa.gov)>; Brown, Amy <[Amy.Brown@fdacs.gov](mailto:Amy.Brown@fdacs.gov)>; Clark, Marah <[Marah.Clark@fdacs.gov](mailto:Marah.Clark@fdacs.gov)>; Everton, Jerry <[Gerald.Everton@fdacs.gov](mailto:Gerald.Everton@fdacs.gov)>; Garcia, Beth <[garcia.beth@epa.gov](mailto:garcia.beth@epa.gov)>; Torres, Ramon <[Torres.Ramon@epa.gov](mailto:Torres.Ramon@epa.gov)>; Zapata, Cesar <[Zapata.Cesar@epa.gov](mailto:Zapata.Cesar@epa.gov)>; Rodgers-Smith, Delores <[Rodgers-Smith.Delores@epa.gov](mailto:Rodgers-Smith.Delores@epa.gov)>; Sturdivant, Donnette <[Sturdivant.Donnette@epa.gov](mailto:Sturdivant.Donnette@epa.gov)>

**Subject:** RE: Florida PFAS Concerns

Good afternoon!

I agree that Florida stakeholders are interested in when more information will become available.

In reference to the first question, our stakeholders would like more detail on the registrant's response. When can they expect the registrant to reach out? Will the product be picked up or returned to the company? Will the product be replaced?

Thank you for reaching out. We look forward to learning more.

**Kelly Friend**  
Director  
Division of Agricultural Environmental Services  
Florida Department of Agriculture and Consumer Services

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[Kelly.Friend@FDACS.gov](mailto:Kelly.Friend@FDACS.gov)

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**From:** Moffet, Erin <[Erin.Moffet@fdacs.gov](mailto:Erin.Moffet@fdacs.gov)>  
**Sent:** Tuesday, February 23, 2021 12:24 PM  
**To:** Dominy, Randy <[Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)>; Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>; Friend, Kelly <[Kelly.Friend@fdacs.gov](mailto:Kelly.Friend@fdacs.gov)>  
**Cc:** Frazier, Courtney <[Courtney.Frazier@fdacs.gov](mailto:Courtney.Frazier@fdacs.gov)>; Jones, Aaryn <[Jones.Aaryn@epa.gov](mailto:Jones.Aaryn@epa.gov)>; Brown, Amy <[Amy.Brown@fdacs.gov](mailto:Amy.Brown@fdacs.gov)>; Clark, Marah <[Marah.Clark@fdacs.gov](mailto:Marah.Clark@fdacs.gov)>; Everton, Jerry <[Gerald.Everton@fdacs.gov](mailto:Gerald.Everton@fdacs.gov)>; Garcia, Beth <[garcia.beth@epa.gov](mailto:garcia.beth@epa.gov)>; Torres, Ramon <[Torres.Ramon@epa.gov](mailto:Torres.Ramon@epa.gov)>; Zapata, Cesar <[Zapata.Cesar@epa.gov](mailto:Zapata.Cesar@epa.gov)>; Rodgers-Smith, Delores <[Rodgers-Smith.Delores@epa.gov](mailto:Rodgers-Smith.Delores@epa.gov)>; Sturdivant, Donnette <[Sturdivant.Donnette@epa.gov](mailto:Sturdivant.Donnette@epa.gov)>  
**Subject:** RE: Florida PFAS Concerns

As there are still many questions outstanding, does EPA have a timeline on when more information may be released to address some of these from Florida, other states, and stakeholders? Will there be another call scheduled soon?

Thanks!  
Erin

**Erin M. Moffet**  
Federal Affairs Director | FDACS  
O: (202) 443-4102 | C: (850) 766-7358  
Pronouns: she/her/hers

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---

**From:** Dominy, Randy <[Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)>  
**Sent:** Tuesday, February 23, 2021 12:12 PM  
**To:** Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>; Friend, Kelly <[Kelly.Friend@fdacs.gov](mailto:Kelly.Friend@fdacs.gov)>  
**Cc:** Moffet, Erin <[Erin.Moffet@fdacs.gov](mailto:Erin.Moffet@fdacs.gov)>; Frazier, Courtney <[Courtney.Frazier@fdacs.gov](mailto:Courtney.Frazier@fdacs.gov)>; Jones, Aaryn <[Jones.Aaryn@epa.gov](mailto:Jones.Aaryn@epa.gov)>; Brown, Amy <[Amy.Brown@fdacs.gov](mailto:Amy.Brown@fdacs.gov)>; Clark, Marah <[Marah.Clark@fdacs.gov](mailto:Marah.Clark@fdacs.gov)>; Everton, Jerry <[Gerald.Everton@fdacs.gov](mailto:Gerald.Everton@fdacs.gov)>; Garcia, Beth <[garcia.beth@epa.gov](mailto:garcia.beth@epa.gov)>; Torres, Ramon <[Torres.Ramon@epa.gov](mailto:Torres.Ramon@epa.gov)>; Zapata, Cesar <[Zapata.Cesar@epa.gov](mailto:Zapata.Cesar@epa.gov)>; Rodgers-Smith, Delores <[Rodgers-Smith.Delores@epa.gov](mailto:Rodgers-Smith.Delores@epa.gov)>; Sturdivant, Donnette <[Sturdivant.Donnette@epa.gov](mailto:Sturdivant.Donnette@epa.gov)>  
**Subject:** [External] RE: Florida PFAS Concerns

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Thanks for sharing Kelly.

Randy Dominy  
Chemical Safety Section  
Land, Chemical and Redevelopment Division  
EPA, Region 4  
Atlanta, GA 30303  
404-562-8996

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**From:** Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>  
**Sent:** Tuesday, February 23, 2021 11:34 AM  
**To:** Kelly Friend <[Kelly.Friend@freshfromflorida.com](mailto:Kelly.Friend@freshfromflorida.com)>; Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>  
**Cc:** Moffet, Erin <[Erin.Moffet@fdacs.gov](mailto:Erin.Moffet@fdacs.gov)>; Frazier, Courtney <[courtney.frazier@fdacs.gov](mailto:courtney.frazier@fdacs.gov)>; Dominy, Randy <[Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)>; Jones, Aaryn <[Jones.Aaryn@epa.gov](mailto:Jones.Aaryn@epa.gov)>; Brown, Amy <[Amy.Brown@fdacs.gov](mailto:Amy.Brown@fdacs.gov)>; Clark, Marah <[Marah.Clark@fdacs.gov](mailto:Marah.Clark@fdacs.gov)>; Everton, Jerry <[Gerald.Everton@fdacs.gov](mailto:Gerald.Everton@fdacs.gov)>; Garcia, Beth <[garcia.beth@epa.gov](mailto:garcia.beth@epa.gov)>; Torres, Ramon <[Torres.Ramon@epa.gov](mailto:Torres.Ramon@epa.gov)>; Zapata, Cesar <[Zapata.Cesar@epa.gov](mailto:Zapata.Cesar@epa.gov)>  
**Subject:** RE: Florida PFAS Concerns

Kelly,

Thank you for contacting EPA's Office of Pesticide Programs regarding Per- and Polyfluoroalkyl Substances (PFAS) in Pesticide Packaging.

At this time, we can only answer your first question: States with existing stock of Anvil 10+10 that is stored in HDPE containers should red tag that inventory and hold for now. Clarke Mosquito has informed EPA that it will reach out to all its customers regarding management of its Anvil 10+10 product.

We are working to address your other questions below and will be in touch with information soon.

Best regards,

Office of Pesticide Programs  
U.S. Environmental Protection Agency

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**From:** Friend, Kelly <[Kelly.Friend@fdacs.gov](mailto:Kelly.Friend@fdacs.gov)>  
**Sent:** Saturday, February 6, 2021 7:59 AM  
**To:** Pesticidepackaging <[Pesticidepackaging@epa.gov](mailto:Pesticidepackaging@epa.gov)>  
**Cc:** Moffet, Erin <[Erin.Moffet@fdacs.gov](mailto:Erin.Moffet@fdacs.gov)>; Frazier, Courtney <[courtney.frazier@fdacs.gov](mailto:courtney.frazier@fdacs.gov)>; Dominy, Randy <[Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)>; Jones, Aaryn <[Jones.Aaryn@epa.gov](mailto:Jones.Aaryn@epa.gov)>; Brown, Amy <[Amy.Brown@fdacs.gov](mailto:Amy.Brown@fdacs.gov)>; Clark, Marah <[Marah.Clark@fdacs.gov](mailto:Marah.Clark@fdacs.gov)>; Everton, Jerry <[Gerald.Everton@fdacs.gov](mailto:Gerald.Everton@fdacs.gov)>  
**Subject:** Florida PFAS Concerns

The Florida Department of Agriculture and Consumers Services (FDACS) appreciates the opportunity to submit questions and concerns regarding the Environmental Protection Agency's (EPA) recent finding of Per- and Polyfluoroalkyl Substances (PFAS) in pesticide packaging. The January 14<sup>th</sup> press release concerning EPA's action to address PFAS in a

mosquito control product caused great concern not only for mosquito control programs, but also for all agrichemical producers, distributors, and users who may purchase products packaged in similar containers.

After hearing from Florida stakeholders, here are some additional questions we ask that EPA consider as this issue is further evaluated:

- What should be done with remaining stocks of Anvil 10+10? Can more information be provided on the registrant's response?
- Other than Anvil 10+10, what other packaging/products are affected, including those that may go beyond agrichemical industry such as in the food industry or homeowner products? Can a list be provided?
- Will affected products be placed under Stop Sale/Stop Use by EPA or State Lead Agencies?
- Is there a Safety Data Sheet (SDS) for the packaging?
- Is the PFAS contamination confirmed to be linked to the fluorination process? If so, what are the alternatives to fluorination or alternative types of rigid containers available to the agrichemical industry?
- After Anvil 10+10 is properly mixed (diluting the concentrate) and applied at the maximum label rate, what level of PFAS is making it into the environment?
- Will there be a foreseeable interruption in supply and inventory if the science leads to a change in fluorinated HDPE containers?
- What is the position of other governments and trade partners, including Canada, Mexico, and the European Union, on PFAS? Are levels of concern or action levels established in other countries?
- What will this mean for export/import of agrichemical products? What will this mean import/export of agricultural crops that were treated with agrichemicals stored in fluorinated HDPE packaging?

We appreciate EPA providing information to states as quickly as possible. We also request that careful consideration be given to a communication plan. While scientific information is critical, it is also important to provide information that addresses concerns of the general public.

If you have questions please feel free to reach out. We hope to continue a dialogue with EPA on this issue.

Sincerely,

**Kelly Friend**

Director  
Division of Agricultural Environmental Services  
Florida Department of Agriculture and Consumer Services

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